Before the
Federal Communications Commission
Washington, DC 20554

In the matter of:

Notice of Proposed Rulemaking

Schools and Libraries Universal Service
Support Mechanism

WC Docket No. 13-184
CC Docket No. 02-6

**COMMENTS ON THE NOTICE OF PROPOSED RULEMAKING
FOR THE SCHOOLS AND LIBRARIES UNIVERSAL SERVICE MECHANISM
(FCC 13-100)**

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Introduction

Broadcore respectfully submits these comments in response to the Federal Communications Commission's ("Commission" or "FCC") Public Notice regarding the Notice of Proposed Rulemaking for the Schools and Libraries Universal Service Mechanism, commonly known as the E-Rate Program.

Broadcore offers business and public sector clients a unified communications platform for voice (VoIP), data, video, and mobility communications. Through our all-in-one communications services and comprehensive client support, we enable organizations to increase staff productivity, accelerate processes, and improve customer care through tight integration of dispersed communications endpoints for office, mobile, or call center employees.

Discussion

Hosted VoIP

Broadcore comments that hosted VoIP services are consistent with the FCC's original program charter to provide advanced telecommunications services, and strenuously urges the FCC to continue to fund Hosted VoIP services as Priority 1 eligible services.

Broadcore comments that hosted VoIP services are highly cost-effective, robust, and reliable, and that its VoIP services are truly cloud-hosted, with a minimum of on-premises equipment. Further, as advanced telecommunications services, the underlying call management architecture is scalable and extensible, easily adapting to hosted video conferencing, email integration, and other services.

Outdated Services

In Paragraphs 90 through 95, the FCC requests comment on phasing out "outdated services", including traditional hardware PBXs, POTS, paging services, and call blocking, and Broadcore unreservedly supports this initiative. Outdated technologies should be phased out of the program, along with POTS and other legacy services.

Broadcore further comments that features such as paging support are often included as ancillary with hosted VoIP offerings, and should be considered as such, and not subject to cost-allocation.
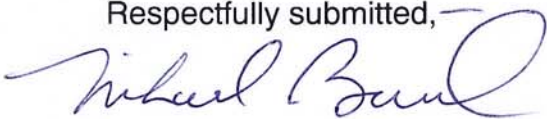
Transitioning Voice Support to Broadband

In Paragraph 105-110, the FCC requests comment on phasing out support for "services that are used only for voice communications." Broadcore is unclear whether the FCC includes advanced telecommunications services, such as cloud-based, hosted VoIPin this category, or only legacy PBXs, Centrex, POTs, or other truly outdated technologies. In any event, Broadcore comments that discontinuing outdated voice communications is consistent with the original program charter to deliver advanced voice, video, and data services to K12 schools and libraries, and supports this initiative. However, Broadcore does not believe advanced telecommunications services, such as hosted VoIP services, should be discontinued.

Broadcore's hosted VoIP services clearly fall under the purview of SECA's definition of "telecommunications services used for both data and voice telecommunications services," and agrees with SECA that such services "should continue to be fully eligible for E-Rate without requiring any cost allocation."

Broadcore agrees with SECA, and urges the FCC to draw the distinction between advanced hosted VoIP services and outdated voice services as well.

Respectfully submitted,

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